

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

FREEDOM PATENTS LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,
and SPECTRUM GULF COAST, LLC,

Defendants.

CIVIL ACTION NO. 4:23-cv-301-ALM

JURY TRIAL DEMANDED

EXHIBIT A – PROPOSED DEADLINES

Proposed Deadline	Description
Wednesday November 22, 2023	P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served.
Monday, December 18, 2023	Join Additional Parties
To be discussed at Mgmt. Conf.	Mediation. The Court will discuss appointing a mediator at the Scheduling Conference.
Monday, December 18, 2023	P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.
Thursday, December 28, 2023	Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).
Wednesday, January 17, 2024	Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).
Friday, February 23, 2024	Parties' Final Amended Pleadings (A motion for leave is required.)

Friday, February 23, 2024	Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.
Tuesday, March 5, 2024	Respond to Amended Pleadings
Sunday, March 17, 2024	Completion date for discovery on claim construction (P.R. 4-4).
Monday, March 18, 2024	Opening claim construction brief (P.R. 4-5(a)).
Monday, March 25, 2024	Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).
Tuesday, April 9, 2024	Submit technology synopsis/tutorial (both hard copy and disk).
Tuesday, April 9, 2024	Responsive claim construction brief (P.R. 4-5(b)).
Monday, April 22, 2024	Reply claim construction brief (P.R. 4-5(c)).
Friday, April 26, 2024	Parties to file joint claim construction and chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.
Monday, May 6, 2024	Proposed Claim Construction hearing Monday, May 6, 2024, at 1:30 p.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
Monday, June 3, 2024	Comply with P.R. 3-7. (Designation of Willfulness Opinions).
Monday, June 17, 2024	Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.

Monday, July 15, 2024	[[Fact]] Discovery Deadline. All discovery must be served in time to be completed by this date.
Monday, July 15, 2024	Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).
Monday, August 5, 2024	Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their expert witness report, to include for ALL experts all information set out in Rule 26(2)(B). Note: Objections to any expert, including Daubert motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.
Tuesday, August 13, 2024	[[Expert]] Discovery Deadline.
Friday, August 16, 2024	File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7. Responses to motions shall be due in accordance with Local Rule CV-7(e).
Wednesday, November 27, 2024	Notice of intent to offer certified records
Wednesday, November 27, 2024	Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order (See www.txed.uscourts.gov) and Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in nonjury cases).
Wednesday, December 4, 2024	Motions in limine due File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the court. At this date, all that is required to be submitted to the court is a hyperlinked exhibit list on disk (2 copies) and no hard copies

Friday, December 6, 2024	<p>Deposition Designation due. Each party who proposes to offer a deposition shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and request cross- examination line and page numbers to be included. Counsel must consult on any objections, and only those which cannot be resolved shall be presented to the Court.</p> <p>The party who filed an initial Video Deposition Designation is responsible for preparation of the final edited video in accordance with all parties' designations, the applicable Federal Rules of Civil Procedure, and the Court's rulings on objections.</p>
Friday, December 20, 2024	<p>Response to motions in limine due File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses). If numerous objections are filed the court may set a hearing prior to the final pretrial conference. File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law).</p> <p>If Parties will be requesting daily copy of the transcript during trial, they must notify the Court's court reporter, Chris Bickham, Chris_Bickham@txed.uscourts.gov, by this date.</p>
Friday, January 3, 2025	Final Pretrial Conference at 1:30 p.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
TBD	10:00 a.m. Jury Selection and Trial at the Paul Brown United States Courthouse located at 101 East Pecan Street in Sherman, Texas.